

By e-mail to: ccyourview@tfl.gov.uk

6 October 2021

Dear Sir or Madam

New Congestion Charge proposals

London TravelWatch is the statutory body representing London's transport users. We are grateful for the opportunity to comment on TfL's congestion charging proposals.

London TravelWatch supports the principle of congestion charging as it is the only realistic way of tackling congestion and managing the demand for road space in London. It enables the local highway authority to prioritise road space for the most space efficient modes - bus, walking and cycling.

With regard to TfL's proposal to retain the temporary change introduced in June 2020 for congestion charging at weekends, we note in TfL's analysis that traffic levels at weekends are similar to weekdays, with traffic even higher than on an average weekday pre-pandemic, causing delay to essential traffic including buses. TfL explain that the highest levels of traffic are seen on weekends from midday, which contributes to congestion and delays on the roads including for bus passengers.

This is in line with the Department for Transport's ongoing data of transport use during the pandemic. Here, the recorded level of all motor vehicle traffic on Britain's roads has been higher at the weekend than on weekdays for every weekend since the middle of May 2021. During the same time period, motor vehicle traffic has been above 90% of pre-pandemic levels on every weekday, and in recent weeks sometimes even at 100% or higher.¹

TfL have also stated in this consultation a £15 charge on Saturday and Sunday afternoons is expected to reduce car kms by around 15% compared to a situation where no changes were made to the pre-pandemic scheme (i.e. when there was no weekend charging).

Given the current traffic statistics and TfL's expected outcomes from the proposals, London TravelWatch accepts the need for the continuation of the extension of the operational hours at weekends. As TfL state that overall traffic levels are lower on weekend mornings compared to an average weekday, it would seem reasonable to restrict the charge's weekend hours of operation to the proposed times of 1200-1800.

With regard to reverting the weekday congestion charge hours to the same hours as pre-pandemic (i.e. no longer charging from 1800-2200), we note that TfL have considered, amongst other things, the changing and uncertain nature of weekday travel patterns, and the impact on the evening economy in central London. TfL have stated that these hours will be kept under review to understand their impact on evening traffic. London TravelWatch believes that it is critical that this review be ongoing and that if traffic levels and flows are negatively impacted,

¹ Department for Transport, Transport Use during the coronavirus (COVID-19) pandemic, update 4 October 2021

especially affecting bus passengers, that TfL commit to bringing forward proposals to lengthen the charging hours again.

Whilst we do not offer a view on the charge level, we are positive to TfL's analysis that the charge increase will reduce car traffic total kilometres driven in the charging zone by around 4% on an average weekday in the proposed charging hours, compared to a situation where no changes were made to the pre-pandemic scheme.

In addition to supporting congestion charging, London TravelWatch believes that much more must be done to prioritise bus services on all of the roads they travel on. We have promoted a package of measures, such as longer operational hours for bus lanes, a review of parking on bus routes, and more bus and cycle only streets, that we believe would improve bus speeds and protect bus services from the impact of general traffic congestion.

Less congested streets mean more reliable bus journey times. In the first quarter of 2019/20 (i.e. pre-pandemic) bus speeds were only 9.3 miles per hour. In the same quarter 12 months later, almost entirely the lockdown period, bus speeds increased to 11.3 miles per hour. However, as traffic levels have increased with the easing of lockdown restrictions, bus speeds have begun dropping again, and are now down to 9.6 miles per hour.²

London TravelWatch also believes that it is now time to take a detailed look at a wider, more sophisticated form of roads pricing. This would charge per mile travelled and according to local demand on the network. It would also more fairly allocate the external costs to those who benefit from being able to use their vehicle in free-flowing conditions and would improve bus services by reducing delays, pay for more services, and provide a better walking and cycling environment.

Road pricing would also help decarbonise the transport system; cut noise and emissions; reduce greenhouse gases; promote active travel and improve journey time reliability of all the road-based ways of getting about, including business deliveries. And with fewer vehicle miles travelled, it is expected there would be fewer road traffic casualties.

Although no city the size of London has introduced a roads pricing scheme, they have generally succeeded in reducing traffic levels, such as a 9% reduction in traffic seen in Stockholm and a 47% reduction in Milan.

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² Transport for London, Bus Network Performance, Quarter 1 in 2019/20, 2020/21 and 2021/22